

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

**D&J INVESTMENTS OF
CENLA LLC, *ET AL.***

VERSUS

BAKER HUGHES A GE CO, LLC, *ET AL.*

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NO. 1:20-CV-01174

JUDGE DAVID C. JOSEPH

**MAGISTRATE JUDGE JOSEPH
H. L. PEREZ-MONTES**

FIRST SUPPLEMENTAL AND AMENDING COMPLAINT

NOW INTO COURT, through undersigned counsel, come petitioners, D&J Investments of Cenla, LLC, et al., who respectfully supplements and amends their original petition for damages as follows:

I.

Your petitioners first amend and supplement their original Petition for Damages by the amendment of paragraph 1 so that it now correctly reads as follows:

“The petitioners are:

- A) **D&J INVESTMENTS OF CENLA, LLC**, a Louisiana limited liability company domiciled in the Parish of Grant, authorized to do and doing business in the State of Louisiana;
- B) **DEBORAH H. GREER**, a resident of the full age of majority domiciled in the Parish of Grant, State of Louisiana;
- C) **JAMES W. GREER, JR.**, a resident of the full age of majority domiciled in the Parish of Grant, State of Louisiana;
- D) **DANIEL L. WEBB**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- E) **JIM ADAMS**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;

- F) **DARWIN OLIVER ARRINGTON**, as trustee of The Darwin Oliver Arrington and Donna Kay Smith Arrington Living Trust, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- G) **RICHARD BARDWELL**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- H) **ROBERT E. BARFIELD**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- I) **JAMES BENEDICT**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- J) **CASSANDRA S. CARMOUCHE**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- K) **DANIEL J. CAYSE**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- L) **MICHAEL S. CERAMI**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- M) **DAVID W. CHESSER, SR.**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- N) **EMURAL COOK**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- O) **JACK COOPER, JR.**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- P) **SHERRY S. DANIELS**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- Q) **LATONNIA G. DOWNS**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- R) **TERESA B. DREXEL**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;

- S) **GARY K. ERMATINGER**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- T) **SANDRA J. FOUNTAIN**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- U) **PETER W. GARDNER**, as trustee for the Mary C. Gardner Living Trust, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- V) **ANDRE GARSAUD**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- W) **ELLEN GASPARD**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- X) **SUSAN C. GAUTHIER**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- Y) **JOHNNY GILLEY**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- Z) **MICHAEL GUILLORY**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- AA) **JAMES HODGES**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- BB) **JENNIFER LONG**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- CC) **DERRICK J. MALONE**, individually and on behalf of **RAPIDES INVESTMENTS LLC**, a resident of the state of California, being of the full age of majority in Orange County, State of California;
- DD) **ADAM MCCOY**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- EE) **JAMES A. METHVIN**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;

- FF) **SHANE MORGAN**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- GG) **SANDRA NAGLE**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- HH) **ELLIS NICK**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- II) **AMY OVERFIELD**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- JJ) **MARK A. PETERSON**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- KK) **SANDRA K. SHIRAH**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- LL) **CHARLES M. SMITH**, as trustee for The Charles Milton Smith and Barbara Jane conn Smith Living Trust, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- MM) **BRIDGET R. TAYLOR**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- NN) **SHERRY J. TAYLOR**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- OO) **NICHOLAS E. THOMPSON**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- PP) **CLYDE M. TODD, JR.**, as trustee of the Clyde Mitchell Todd, Jr. and Mary Lynn Pyron Todd Living Trust, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- QQ) **JOHN S. TUCKER**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- RR) **ANGELA WAGGENER**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;

- SS) **ARTHUR WALLER**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- TT) **DENISE WHITE**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- UU) **RANDY L. WILKERSON**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- VV) **JOE W. AGUILLARD**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- WW) **BRIAN BUCKOSKI**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- XX) **BENJAMIN J. COLVIN**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- YY) **STEVEN C. COOK**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- ZZ) **ROGER H. CORLEY**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- AAA) **MARK A. CRAWFORD**, a resident of the full age of majority domiciled in the Parish of Grant, State of Louisiana;
- BBB) **ROBIN L. EDDLEMON**, , a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- CCC) **DONALD L. FUHRMANN, JR.**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- DDD) **DONALD L. FUHRMANN, SR.**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- EEE) **JERRY GEORGE**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- FFF) **PAULINE H. GIVENS**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;

- GGG) **KAREN K. GUILLORY**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- HHH) **CASEY HENAGAN**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- III) **STEWART D. HENAGAN**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- JJJ) **WILLIAM F. HOCKE**, as trustee for William Francis Hocke, Jr., and Susan Jeanne Barrios Hocke Living Trust, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- KKK) **MARK H. LACROIX**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- LLL) **MEREK MARCANTEL**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- MMM) **RANDAL A. MARINO**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- NNN) **JOHN L. MILLINER**, as trustee for The John and Sandra Milliner Living Trust, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- OOO) **TERRY D. MITCHELL**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- PPP) **JASON O'NEAL**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- QQQ) **OLDE OAK HOMES, LLC**, a Louisiana limited liability company domiciled in the Parish of Rapides, authorized to do and doing business in the State of Louisiana;
- RRR) **SHARON DARLENE POWELL**, a resident of the full age of majority domiciled in the Parish of Grant, State of Louisiana;
- SSS) **ROBERT A. RAY**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;

- TTT) **JILL REID**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- UUU) **JOHNNIE RODGERS**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- VVV) **KENNETH ROY**, as trustee for The Kenneth Gerard Roy and Susan Marie Falcon Roy Living Trust, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- WWW) **CATHERINE L. SHEVNIN**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- XXX) **RAYMOND STEWART**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- YYY) **JASON L. TARVER**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- ZZZ) **TRAVIS LAND COMPANY, LLC.**, a Louisiana limited liability company domiciled in the Parish of Rapides, authorized to do and doing business in the State of Louisiana;
- AAAA) **JODI VANHUIS**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- BBBB) **DENNIS C. WARD**, as trustee for The Dennis Creighton Ward and Barbara Jane Ward Living Trust, resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- CCCC) **CLINTON A. WHITE**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana;
- DDDD) **WILLIAM R. WOODWARD, JR.**, a resident of the full age of majority domiciled in the Parish of Rapides, State of Louisiana.”

II.

Your petitioners next amend and supplement their original Petition for Damages by the amendment of paragraph 2 so that it now correctly reads as follows:

“The petitioners own the following respectively described properties in and/or near the Gray Stone subdivision area in the Parish of Grant, State of Louisiana, just north of the former Dresser Industrial Valve Operations facility;¹ properties in and/or near the Aurora Park subdivision in the Parish of Rapides, State of Louisiana, just east of the Dresser facility; and properties in and/or near the Timber Trails subdivision in the Parish of Rapides, State of Louisiana, just south of the Dresser facility:

- A) **D&J INVESTMENTS OF CENLA, LLC**, owns the following described property which is located in the Parish of Grant:

Lots 12, 13, 14, 15, 16, 17 of Kaylie Acres Subdivision,
Parcel I.D. #0200061000E;

Lots 14, 15, 26 of Gray Stone Subdivision
Parcel I.D. #0200171798Z; and

NE OF SW; W/4 OF NW of SE; 24.56 acres in E/2 of NE, SEC. 8-5-1 West,
Less 24.26 acres (464-124), Less 26.25 acres (464-340)
Parcel I.D. #200182200;

- B) **DEBORAH H. GREER**, owns the following described property which is located in the Parish of Grant:

445 Grays Creek Road, Dry Prong, Louisiana 71423
Parcel I.D. #200073255;

- C) **JAMES W. GREER, JR.**, owns the following described property which is located in the Parish of Grant:

123 Kaylie Lane, Dry Prong, Louisiana 71423
Lots 9, 10, and 11 of Kaylie Acres Subdivision, Parcel I.D. #0200061000K;

¹ A division of Dresser Industries, Inc. Hereinafter referred to as the “Dresser facility.”

- D) **DANIEL L. WEBB**, owns the following described property which is located in the Parish of Rapides:

22077 Highway 167, Dry Prong, Louisiana 71423
6.5 Acres in S2 of S2 Sec. 9, T5NR1W, Parcel I.D. #25-9-68003-5, and

2.076 acres in Sections 9 and 16, Township 5 North - Range 1 West
Parcel I.D. #25-9-68003-28;

- E) **JIM ADAMS** owns the following described property which is located in the Parish of Rapides:

94 Aurora Drive, Pineville, Louisiana 71360
Lot 61, Aurora Park, Less East 5', Parcel I.D. # 25-16-410-59;

- F) **DARWIN OLIVER ARRINGTON**, as trustee of The Darwin Oliver Arrington and Donna Kay Smith Arrington Living Trust, owns the following described property which is located in the Parish of Rapides:

106 Aurora Drive, Pineville, Louisiana 71360
Lot 23, Aurora Park Subdivision, Parcel I.D. #25-16-410-21;

- G) **RICHARD BARDWELL**, owns the following described property which is located in the Parish of Rapides:

1510 Masters Drive, Pineville, Louisiana 71360;
Lot 8 Fairway East, Unit II Parcel I.D. #25-16-3059-8;

- H) **ROBERTE. BARFIELD**, owns the following described property which is located in the Parish of Rapides:

7919 Shreveport Highway, Pineville, Louisiana 71360
0.86 Acres, in Section 16, T5NR1W, Parcel I.D. #25-16-68026-1;

- I) **JAMES BENEDICT**, owns the following described property which is located in the Parish of Rapides:

420 Ates Road, Pineville, Louisiana 71360
Lots 11 & 12, T.L. Honeycutt Subdivision, Parcel I.D. #25-15-4360-10;

- J) **CASSANDRA S. CARMOUCHE**, owns the following described property which is located in the Parish of Rapides:

720 Austin Drive, Pineville, Louisiana 71360
Lot 5, Sunrise Estates Subdivision, Parcel I.D. #25-16-8825-5;

- K) **DANIEL J. CAYSE**, owns the following described property which is located in the Parish of Rapides:

7497 Shreveport Highway, Pineville, Louisiana 71360
.504 Acres in Section 16, T5NR1W, Parcel I.D. #25-16-68026-5;

- L) **MICHAEL S. CERAMI**, owns the following described property which is located in the Parish of Rapides:

98 Aurora Drive, Pineville, Louisiana 71360
Lot 59 & 5' of Lot 60, Aurora Park Subdivision, Parcel I.D. #25-16-410-57;

- M) **DAVID W. CHESSER, SR.**, owns the following described property which is located in the Parish of Rapides:

124 Arlington Drive, Pineville, Louisiana 71360
Lot 51, Aurora Park Subdivision, Parcel I.D. #25-16-410-49;

- N) **EMURAL COOK**, owns the following described property which is located in the Parish of Rapides:

138 Arlington Drive, Pineville, Louisiana 71360
Lot 44, Aurora Park Subdivision, Parcel I.D. #25-16-410-42;

- O) **JACK COOPER, JR.**, owns the following described property which is located in the Parish of Rapides:

316 Ates Road, Pineville, Louisiana 71360
1 Acre: In Northwest 4 Southwest 4, Section 15, Township 5 North-Range 1 West: Frtg. 161.38' on Ates Road X 270', Parcel I.D. #25-15-68020-28; also has H/E on adjacent Parcel I.D. #1210220425;

- P) **SHERRY S. DANIELS**, owns the following described property which is located in the Parish of Rapides:

87 Aurora Drive, Pineville, Louisiana 71360
Lot 65, Aurora Park Subdivision, Parcel I.D. #25-16-410-63;

- Q) **LATONNIA G. DOWNS**, owns the following described property which is located in the Parish of Rapides:

7517 Shreveport Highway, Pineville, Louisiana 71360
0.467 Acres: Being 106.45' x 293.9' x 46.2' x 280.65' in Northwest 4 of Northeast 4 Section 16, Township 5 North Range 1 West, Parcel I.D. #25-16-68026-3;

- R) **TERESA B. DREXEL**, owns the following described property which is located in the Parish of Rapides:

126 Arlington Drive, Pineville, Louisiana 71360
Lot 50, Aurora Park Subdivision, Parcel I.D. #25-16-410-48;

- S) **GARY K. ERMATINGER**, owns the following described property which is located in the Parish of Rapides:

8162 Titleist Drive, Pineville, Louisiana 71360
Lot 47, Fairway East, Parcel I.D. #25-16-3055-47;

- T) **SANDRA J. FOUNTAIN**, owns the following described property which is located in the Parish of Rapides:

101 Aurora Drive, Pineville, Louisiana 71360
Lot 3, Aurora Park Subdivision, Parcel I.D. #25-16-410-3;

- U) **PETER W. GARDNER**, as trustee for the Mary C. Gardner Living Trust, owns the following described property which is located in the Parish of Rapides:

728 Austin Drive, Pineville, Louisiana 71360
Lot 4, Sunrise Estates Subdivision, Parcel I.D. #25-16-8825-4;

- V) **ANDRE GARSAUD**, owns the following described property which is located in the Parish of Rapides:

96 Aurora Drive, Pineville, Louisiana 71360
Pt. Lot 60, Aurora Park Subdivision & Adj. 5' Strip of Lot 61
Parcel I.D. #25-16-410-58;

- W) **ELLEN GASPARD**, owns the following described property which is located in the Parish of Rapides:

115 Arlington Drive, Pineville, Louisiana 71360
Lot 29, Aurora Park Subdivision, Parcel I.D. #25-16-410-27;

- X) **SUSAN C. GAUTHIER**, owns the following described property which is located in the Parish of Rapides:

740 Austin Drive, Pineville, Louisiana 71360
Lot 1, Sunrise Estates Subdivision, Parcel I.D. #25-16-8825-1;

- Y) **JOHNNY GILLEY**, owns the following described property which is located in the Parish of Rapides:

6901 Shreveport Highway, Pineville, Louisiana 71360
1.65 Acres: FRTG. 50' on Hwy 71 in NE4 of SW4 Section 15, T5NR1W,
Parcel I.D. #25-15-68020-3;

- Z) **MICHAEL GUILLORY**, owns the following described property which is located in the Parish of Rapides:

106 Aurora Drive, Pineville, Louisiana 71360
Lot 23, Aurora Park Subdivision, Parcel I.D. #25-16-410-21;

- AA) **JAMES A. HODGES, JR.**, owns the following described property which is located in the Parish of Rapides:

1526 Masters Drive, Pineville, Louisiana 71360
Lot 4, Fairway East, Unit II Parcel I.D. #25-16-3059-4;

BB) **JENNIFER LONG**, owns the following described property which is located in the Parish of Rapides:

97 Aurora Drive, Pineville, Louisiana 71360
Lot 70, Aurora Park Subdivision, Parcel I.D. #25-16-410-68;

CC) **DERRICK J. MALONE**, owns the following described properties which is located in the Parish of Rapides:

812 Austin Drive, Pineville, Louisiana 71360
Lots 46 and 47, Aurora Park Unit II, Parcel I.D. #25-16-411-11; and

784 Austin Drive and 782 Aurora Drive, Pineville, Louisiana 71360
Pt. Lots 2 and 3, Aurora Park Unit II, Parcel I.D. #25-16-411-2;

DD) **ADAM MCCOY**, owns the following described property which is located in the parish of Rapides:

1501 Medalist Drive East, Pineville, Louisiana 71360
Lot 46, Fairway East Subdivision, Parcel I.D. #25-16-3055-46;

EE) **JAMES A. METHVIN**, owns the following described property which is located in the Parish of Rapides:

110 Arlington Drive, Pineville, Louisiana 71360
Lot 57, Aurora Park Subdivision, Parcel I.D. #25-16-410-55;

FF) **SHANE MORGAN**, owns the following described property which is located in the Parish of Rapides:

105 Aurora Drive, Pineville, Louisiana 71360
Lot 12, Aurora Park Subdivision, Parcel I.D. #25-16-410-11;

GG) **SANDRA NAGLE**, owns the following described property which is located in the Parish of Rapides:

129 Arlington Drive, Pineville, Louisiana 71360
Lot 36, Aurora Park Subdivision, Parcel I.D. #25-16-410-34;

HH) **ELLIS NICK**, owns the following described property which is located in the Parish of Rapides:

89 Aurora Drive, Pineville, Louisiana 71360
Lot 66, Aurora Park Subdivision, Parcel I.D. #25-16-410-64;

II) **AMY OVERFIELD**, owns the following described property which is located in the Parish of Rapides:

108 Aurora Drive, Pineville, Louisiana 71360
Lot 22, Aurora Park Subdivision, Parcel I.D. #25-16-410-20;

JJ) **MARK A. PETERSON**, owns the following described property which is located in the Parish of Rapides:

8155 Titlist Drive, Pineville, Louisiana 71360
Pt of Lots 53 and 54 Timber Trails, Unit 7, Parcel I.D. #25-16-9103-5;

KK) **SANDRA K. SHIRAH**,

90 Aurora Drive, Pineville, Louisiana 71360
Lot 63, Aurora Park Subdivision, Parcel I.D. #25-16-410-61;

LL) **CHARLES M. SMITH**, as trustee for The Charles Milton Smith and Barbara Jane conn Smith Living Trust, owns the following described property which is located in the Parish of Rapides:

127 Arlington Drive, Pineville, Louisiana 71360
Lot 35, Aurora Park Subdivision, Parcel I.D. #25-16-410-33;

MM) **BRIDGET R. TAYLOR**, owns the following described property which is located in the Parish of Rapides:

108 Arlington Drive, Pineville, Louisiana 71360
Lot 58, Aurora Park Subdivision, Parcel I.D. #25-16-410-56;

NN) **SHERRY J. TAYLOR**, owns the following described property which is located in the Parish of Rapides:

132 Arlington Drive, Pineville, Louisiana 71360
Lot 47, Aurora Park Subdivision, Parcel I.D. #25-16-410-45;

OO) **NICHOLAS E. THOMPSON**, owns the following described property which is located in the Parish of Rapides:

88 Aurora Drive, Pineville, Louisiana 71360
Lot 64, Aurora Park Subdivision, Parcel I.D. #25-16-410-62;

PP) **CLYDE M. TODD, JR.**, as trustee of the Clyde Mitchell Todd, Jr. and Mary Lynn Pyron Todd Living Trust, owns the following described property which is located in the Parish of Rapides:

8159 Titleist Drive, Pineville, Louisiana 71360
Lot 48, Fairway East, Parcel I.D. #25-16-3055-48; and

Lot 55 & PT. Lot 54, Timber Trails Unit #7, Parcel I.D. #25-16-9103-6;

QQ) **JOHN S. TUCKER**, owns the following described property which is located in the Parish of Rapides:

131 Arlington Drive, Pineville, Louisiana 71360
Lot 37, Aurora Park Subdivision, Parcel I.D. #25-16-410-35;

RR) **ANGELA WAGGENER**, owns the following described property which is located in the Parish of Rapides:

1015 Jennifer's Place, Pineville, Louisiana 71360
Lot 7, Jennifer's Place Subdivision, Parcel I.D. #25-16-5085-7;

SS) **ARTHUR WALLER**, owns the following described property which is located in the Parish of Rapides:

7428 Shreveport Highway, Pineville, Louisiana 71360
0.96 Acres: in NE/C of NW4 of NE4 Sec. 16, T5NR1W on Highway 71 North
Parcel I.D. #25-16-68024-1;

TT) **JAMES A. METHVIN**, owns the following described property which is located in the Parish of Rapides:

109 Arlington Drive, Pineville, Louisiana 71360
Lot 26, Aurora Park Subdivision, Parcel I.D. #25-16-410-24;

UU) **RANDY L. WILKERSON**, owns the following described property which is located in the Parish of Rapides:

101 Arlington Drive, Pineville, Louisiana 71360
Lot 1, Aurora Park Subdivision, Parcel I.D. #25-16-410-1;

VV) **JOE W. AGUILLARD**, owns the following described property which is located in the Parish of Rapides:

107 Garnet Drive, Pineville, Louisiana 71360
Pt. lot 4, Fairway West Unit 4, Parcel I.D. #25-17-3076-5 and
Pt. lot 3, Fairway West Unit 4, Parcel I.D. #25-17-3076-8;

WW) **BRIAN BUCKOSKI**, owns the following described property which is located in the Parish of Rapides:

103 Arlington Drive, Pineville, Louisiana 71360
Lot 2, Aurora Park Subdivision, Parcel I.D.#25-16-410-2;

XX) **BENJAMIN J. COLVIN**, owns the following described property which is located in the Parish of Rapides:

320 Kings Drive, Pineville, Louisiana 71360
Lot 2, Kings Walk Subdivision, Phase I, Parcel I.D. #25-8-5451-2;

YY) **STEVEN C. COOK**, owns the following described property which is located in the Parish of Rapides:

1510 East Medalist Road, Pineville, Louisiana 71360
Lot 15, Fairway East Subdivision, Parcel I.D.#25-16-3055-15;

ZZ) **ROGER H. CORLEY**, owns the following described property which is located in the Parish of Rapides:

1506 East Medalist Drive, Pineville, Louisiana 71360
Lot 13, Fairway East Subdivision, Parcel I.D. #25-16-3055;

AAA) **MARK A. CRAWFORD**, owns the following described property which is located in the Parish of Grant:

242 Grays Creek Road, Dry Prong, Louisiana 71423-0000
2.85 acres and 1.64 acres being part of lot 12 of Pine Heights Subdivision,
Parcel I.D. #0200171798N;

BBB) **ROBIN L. EDDLEMON**, owns the following described property which is located in the Parish of Rapides:

1514 East Medalist Drive, Pineville, Louisiana 71360
Lot 17, Fairway East Subdivision, Parcel I.D. #25-16-3055-17;

CCC) **DONALD L. FUHRMANN, JR.**, owns the following described property which is located in the Parish of Rapides:

1517 East Medalist Drive, Pineville, Louisiana 71360
Lot 35, Fairway East Subdivision, Parcel I.D. #25-16-3055-35;

DDD) **DONALD L. FUHRMANN, SR.**, owns the following described property which is located in the Parish of Rapides:

1606 West Medalist Drive, Pineville, Louisiana 71360
Lot 2, Fairway East Subdivision, Parcel I.D. #25-16-3055-2;

EEE) **JERRY GEORGE**, owns the following described property which is located in the Parish of Rapides:

300 Kings Walk Drive, Pineville, Louisiana 71360
Lot 10, Kings Walk III, Parcel I.D. #25-16-5452-10;

FFF) **PAULINE GIVENS**, owns the following described property which is located in the Parish of Rapides:

341 Kings Drive, Pineville, Louisiana 71360
Lot 7, Kings Walk Subdivision, Parcel I.D. #25-8-5451-7;

GGG) **KAREN K. GUILLORY**, owns the following described property which is located in the Parish of Rapides:

768 Austin Drive, Pineville, Louisiana 71360
Pt. Lots 5, 6, and 7, Aurora Park Subdivision, Parcel I.D. #25-16-411-4;

HHH) **CASEY HENAGAN**, owns the following described property which is located in the Parish of Rapides:

1522 East Medalist Drive, Pineville, Louisiana 71360
Lot 21, Fairway East Subdivision, Parcel I.D. #25-16-3055-21;

III) **STEWART D. HENAGAN**, owns the following described property which is located in the Parish of Rapides:

1805 West Medalist Drive, Pineville, Louisiana 71360
Lot 15, Fairway East Extension, Parcel I.D. #25-16-3058-17;

JJJ) **WILLIAM F. HOCKE**, as trustee for William Francis Hocke, Jr., and Susan Jeanne Barrios Hocke Living Trust, owns the following described property which is located in the Parish of Rapides:

1617 West Medalist Drive, Pineville, Louisiana 71360
Lot 18, Fairway East Subdivision, Parcel I.D. #25-16-3055-18;

KKK) **MARK H. LACROIX**, owns the following described property which is located in the Parish of Rapides:

1628 West Medalist Drive, Pineville, Louisiana 71360
Lot 8, Fairway East Subdivision, Parcel I.D. #25-16-3055-8;

LLL) **MEREK MARCANTEL**, owns the following described property which is located in the Parish of Rapides:

1530 Masters Drive, Pineville, Louisiana 71360
Lot 3, Fairway East, Unit II, Parcel I.D. #25-16-3059-3;

MMM) **RANDAL A. MARINO**, owns the following described property which is located in the Parish of Rapides:

1518 East Medalist Drive, Pineville, Louisiana
Lot 19, Fairway East Subdivision, Parcel I.D. #25-16-3055-19;

NNN) **JOHN L. MILLINER**, as trustee for The John and Sandra Milliner Living Trust, owns the following described property which is located in the Parish of Rapides:

295 Kings Drive, Pineville, Louisiana 71360
Lot 8, King Walk III, Parcel I.D. #25-16-5452-8, and
Lot 9, Kings Walk III, Parcel I.D. #25-16-5452-9;

OOO) **TERRY D. MITCHELL**, owns the following described property which is located in the Parish of Rapides:

290 Kings Drive, Pineville, Louisiana
Lot 11, Kings Walk Subdivision III, Parcel I.D. #25-16-5452-11;

PPP) **JASON O'NEAL**, owns the following described property which is located in the Parish of Rapides:

1626 West Medalist Drive, Pineville, Louisiana 71360
Lot 7, Fairway East Subdivision, Parcel I.D. #25-16-3055-7;

QQQ) **OLDE OAK HOMES, LLC**, owns the following described property which is located in the Parish of Rapides:

112 Arlington Drive, Pineville, Louisiana 71360
Lot 56, Aurora Park Subdivision, Parcel I.D. #25-16-410-54, and

123 Arlington Drive, Pineville, Louisiana 71360
Lot 33, Aurora Park Subdivision, Parcel I.D. #25-16-410-31;

RRR) **SHARON DARLENE POWELL**, owns the following described property which is located in the Parish of Grant, State of Louisiana:

102 Kaylie Lane, Dry Prong, Louisiana 71423
Lot 3, Kaylie Acres Subdivision, Parcel I.D. #0200061000M;

SSS) **ROBERT A. RAY**, owns the following described property which is located in the Parish of Rapides:

79 Aurora Drive, Pineville, Louisiana 71360
Pt. Lot 49, Aurora Park Subdivision, Unit II, Parcel I.D. #25-16-411-10, and

806 Austin Drive, Pineville, Louisiana 71360
Lot 48 and Pt. Lots 47 and 49, Aurora Park, Unit II, Parcel I.D. #25-16-411-9

TTT) **JILL REID**, owns the following described property which is located in the Parish of Rapides:

110 Deerbrook Trail, Pineville, Louisiana 71360
Lot 54, Timber Trails Subdivision, Parcel I.D. #25-17-9110-37;

UUU) **JOHNNIE RODGERS**, owns the following described property which is located in the Parish of Rapides:

1621 West Medalist Drive, Pineville, Louisiana 71360
Lot 20, Fairway East Subdivision, Parcel I.D.#25-16-3055;

VVV) **KENNETH ROY**, as trustee for The Kenneth Gerard Roy and Susan Marie Falcon Roy Living Trust, owns the following described property which is located in the Parish of Rapides:

1631 West Medalist Drive, Pineville, Louisiana 71360
Lot 26, Fairway East Subdivision, Parcel I.D. #25-16-3055-26;

WWW) **CATHERINE L. SHEVNIN**, owns the following described property which is located in the Parish of Rapides:

92 Aurora Drive, Pineville, Louisiana 71360
Lot 62, Aurora Park Subdivision, Parcel I.D. #25-16-410-60;

XXX) **RAYMOND STEWART**, owns the following described property which is located in the Parish of Rapides:

276 Kings Drive, Pineville, Louisiana 71360
Lot 13, Kings Walk Subdivision, III, Parcel I.D. #25-16-5452-13;

YYY) **JASON L. TARVER**, owns the following described property which is located in the Parish of Rapides:

8087 Ridgemont Drive, Pineville, Louisiana 71360
Lot 18, Fairway East Extension, Parcel I.D. #25-16-3058-20;

ZZZ) **TRAVIS LAND COMPANY, LLC**, owns the following described property which is located in the Parish of Rapides:

754 Austin Drive, Pineville, Louisiana 71360
Lot 8 and Part of Lot 7, Aurora Park Subdivision,
Unit II, Parcel I.D. #25-16-411-6, and

818 Austin Drive, Pineville, Louisiana 71360
Lot 45 and Part of Lot 46, Aurora Park Subdivision,
Unit II, Parcel I.D., #25-16-411-7;

AAAA) **JODI VANHUIS**, owns the following described property which is located in the Parish of Rapides:

162 Deerbrook Trail, Pineville, Louisiana 71360
Lot 64, Timber Trails Subdivision, Extension #2, Parcel I.D. #25-16-9110-62;

BBBB) **DENNIS C. WARD**, as trustee for The Dennis Creighton Ward and Barbara Jane Ward Living Trust, owns the following described property which is located in the Parish of Rapides:

1530 East Medalist Drive, Pineville, Louisiana 71360
Lot 25, Fairway East Subdivision, Parcel I.D.#22-16-3055-25;

CCCC) **CLINTON A. WHITE**, owns the following described property which is located in the Parish of Rapides:

280 Kings Drive, Pineville, Louisiana 71360
Lot 12, King's Walk Subdivision, III, Parcel I.D. #25-16-5452-12; and

DDDD) **WILLIAM R WOODWARD, JR.**, owns the following described property which is located in the Parish of Rapides:

1625 West Medalist Drive, Pineville, Louisiana 71360
Lot 22, Fairway East Subdivision, Parcel I.D. #25-16-3055-22.”

III.

Your petitioners next seek leave of Court to amend and supplement their original Petition for Damages by the addition of paragraphs 58A, 58B, and 59C, so that it now correctly reads as follows:

“58A.

Since the time of the plaintiffs’ respective exposures to contaminated soil, vapor, and/or groundwater, the plaintiffs have suffered, and in the future may suffer, physical and mental injuries including, but not limited to, eye, skin and throat irritations; liver damage; kidney damage; neurological damage; pulmonary damage; skin disorders; respiratory disorders; gastrointestinal disorders; fatigue; headaches; muscle pain; confusion; and weakness and appetite loss as a result of exposures to chlorinated hydrocarbons. As a result of the plaintiffs’ respective exposures to chlorinated hydrocarbons, the plaintiffs suffer an increased risk of contracting cancer and other diseases. These increased risks make periodic diagnostic medical examination reasonably necessary. These diseases are not readily discoverable by the plaintiffs without adequate monitoring, medical screening, and/or medical review of their respective symptoms and/or conditions. The early detection of these conditions is essentially the only chance the plaintiffs have for surviving malignant and/or other debilitating disease processes. Monitoring and testing procedures exist which make the early detection of these diseases possible and beneficial. The plaintiffs also have and will suffer from emotional distress, mental depression, anxiety, and other psychological and behavioral changes as a result of their respective exposures to chlorinated hydrocarbons.

58B.

Plaintiffs also show that as a result of their respective exposures they are at a significantly increased risk of contracting the above described diseases, the risk of which is manifest, as well as other such diseases, which may be revealed in the future; that plaintiffs’ respective risks of contracting such diseases are greater than the risk of contracting the same disease had they not been exposed and the chances of members of the public at large of developing these diseases; there are medical monitoring procedures that

make the early detection of these diseases possible; that medical monitoring procedures will be prescribed by qualified physicians and are reasonably necessary according to contemporary scientific principles; the medical monitoring regimes that will be prescribed are different from that normally recommended in the absence of exposure, and there is some demonstrated clinical value in the early detection and diagnosis of diseases resulting from exposure to chlorinated hydrocarbons.

58C.

As a result of the injuries and/or illnesses suffered by the plaintiffs, and/or which they may develop in the future, resulting from their respective exposures to said toxic and/or carcinogenic materials, the plaintiffs have suffered and/or continue to suffer the following damages:

- (a) past, present, and future physical pain and suffering;
- (b) past, present, and future mental pain, suffering, and distress;
- (c) past, present, and future loss of enjoyment of life;
- (d) past, present, and future loss of wages;
- (e) past, present, and future loss of business income;
- (f) past, present, and future loss of earning capacity;
- (g) past, present, and future medical expenses; and
- (H) any and all of other damages to be proven at the trial of this matter.”

IV.

Plaintiffs renew and reiterate all of the allegations (as amended herein) and the prayer of the original Petition for Damages which, except as amended, shall remain unchanged.

WHEREFORE, plaintiffs pray that there be judgment herein in their favor of the plaintiffs

and against the defendants, *in solido*, for all damages as are reasonable in the premises, together with legal interest thereon from the date of judicial demand, until paid, and for all costs of these proceedings.

Respectfully submitted,

Donald T. Carmouche, Bar #02226
Victor L. Marcello, Bar # 9252
John H. Carmouche, Bar #22294
William R. Coenen, III, Bar #27410
Brian T. Carmouche, Bar #30430
Todd J. Wimberley, Bar #34862
Ross J. Donnes, Bar #33098
D. Adele Owen, Bar #21001
Leah C. Poole, Bar #35092
Caroline H. Martin, Bar #33308
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233 South Main Street
Post Office Box 426
Marksville, LA 71351
Telephone: (318) 253-6200
Fax: (318) 253-4044

/s/ D. Adele Owen
Attorneys for Plaintiffs

**PLEASE SERVE THE FIRST SUPPLEMENTAL
AND AMENDING COMPLAINT:**

DRESSER, LLC.

through its registered agent for service of process:
CT Corporation System
3867 Plaza Tower Drive
Baton Rouge, Louisiana 70816

DRESSER RE, LLC

through its registered agent for service of process:
CT Corporation System
3867 Plaza Tower Drive
Baton Rouge, Louisiana 70816

GE OIL & GAS, LLC

through its registered agent for service of process:
CT Corporation System
3867 Plaza Tower Drive
Baton Rouge, Louisiana 70816

GHD SERVICES, INC.

through its registered agent for service of process:
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, Louisiana 70802

HALLIBURTON ENERGY SERVICES, INC.

through its registered agent for service of process:
Capitol Corporate Services, Inc.
8550 United Plaza Boulevard
Building II, Suite 305
Baton Rouge, Louisiana 70809

STANTEC CONSULTING SERVICES, INC.

through its registered agent for service of process:
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, Louisiana 70802

**PLEASE SERVE THE FIRST SUPPLEMENTAL
AND AMENDING COMPLAINT VIA
LOUISIANA LONG ARM STATUTE:**

BAKER-HUGHES, A GE COMPANY, LLC
through its registered agent for service of process:
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201

BAKER HUGHES ENERGY SERVICES LLC
through its registered agent for service of process:
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201